

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-60126-LEIBOWITZ

UNITED STATES OF AMERICA

vs.

KIESEAN PAUL ANDERSON,
a/k/a/ Sean Kingston
Defendant.

GOVERNMENT’S OBJECTION TO PRE-SENTENCE INVESTIGATION REPORT

COMES NOW, the United States of America, by and through its undersigned Assistant United States Attorney, and hereby submits its objections to the revised Pre-Sentence Investigation Report (PSI), and in support, states as follows:

On March 28, 2025, the defendant was found guilty by a jury of Counts One, Three, Four, Five, and Six of a six count indictment. Count One charged the Defendant with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349. Counts Three, Four, Five, and Six charged her with wire fraud, in violation of 18 U.S.C. § 1343.

Thereafter, a PSI was completed by U.S. Probation (DE 128), and it was determined that the Defendant had a total offense level of 25 and a criminal history category of II, for an advisory guidelines imprisonment range of 63-78 months. While it does not ultimately affect the overall guidelines range as calculated, (Under 2B1.1(b)(1)(I), offenses involving more than \$1,500,000 but not more than \$3,500,000 result in a 16 level increase in the offense level), the PSI and its revision omit additional relevant conduct victims, and therefore the Government files this instant objection to ensure that loss amounts and restitution are accurately calculated and awarded to victims.

As outlined below, it is the Government's position that there are now a total of 21 total victims, who suffered an intended loss of \$3,125,601.92 with a restitution loss of \$1,167,700. Twelve (12) of these victims were defrauded within the time periods charged in the instant conspiracy, and ten (10)¹ of these victims were defrauded outside the time period charged in the instant conspiracy but are included as they constitute relevant conduct under the Sentencing Guidelines. USS Special Agent Amanda Cook will testify as to the below chart and will present as evidence text messages, fake wire receipts, and other documents that justify the below loss spreadsheet.²

1	Victim	Date Fraudulent Receipt Sent	Intended Loss	Recovered	Restitution Owed
2	Steven Young	4/26/2023 & 5/15/2023	\$215,000.00	\$215,000.00	\$0.00
3	Mazal Jewelers Inc	10/24/2023	\$285,000.00	\$285,000.00	\$0.00
4	Ocean Auto Center Inc	11/21/2023	\$159,702.78	\$159,702.78	\$0.00
5	Ver Ver Entertainment	1/15/2024	\$40,000.00	\$40,000.00	\$0.00
6	Andrii Nikolenko (Watch Owners: Mark & Iulia Pugachev)*	3/14/2024	\$480,000.00	Watches returned*	TBD
7	Rockstar Jewelers/The Buff Store	8/11/2023 & 9/1/2023	\$18,000.00	\$18,000.00	\$0.00
8	Alan and Co Jewelers LLC	5/13/2022 & 8/25/2023	\$200,000.00	\$200,000.00	\$0.00
9	Approved Jets LLC	8/24/2023 & 8/25/2023	\$47,000.00	TBD	TBD
10	Royalty Motors Inc	2/3/2024	\$306,840.00	\$306,840.00	\$0.00
11	Bo Coates	2/7/2024	\$69,000.00	\$30,500.00	\$38,500.00
12	4610SWR LLC	2/8/2024	\$32,400.00	\$32,400.00	\$0.00
13	California Entertainer Coach	7/6/2023	\$7,271.89	\$7,271.89	\$0.00
14	Dream Watch Sdn Bhd	Multiple (2022)	\$916,000.00	\$0.00	\$916,000.00
15	Keisha Sewell	1/9/2023	\$7,000.00	\$7,000.00	\$0.00
16	Gabriel Ruiz Ramirez	1/4/2023	\$3,944.25	\$3,944.25	\$0.00
17	Uriel Rosenblum	1/3/2023	\$16,866.00	\$16,866.00	\$0.00
18	Professional Audio Design Inc	12/9/2022	\$47,377.00	\$47,377.00	\$0.00
19	Menard Home Group	11/7/2022	\$4,200.00	\$0.00	\$4,200.00
20	Moses Services Inc	10/14/2022	\$76,000.00	\$0.00	\$76,000.00
21	AAA Gold LLC	8/22/2022	\$61,000.00	\$61,000.00	\$0.00
22	Scott Gai Evans - Kings Life Group	11/4/2021	\$133,000.00	\$0.00	\$133,000.00
23			\$3,125,601.92		\$1,167,700.00

WHEREFORE, for the foregoing reasons, the Government objects to the loss amounts as calculated by U.S. Probation and states that the correct intended loss is \$3,125,601.92 with a

¹ One victim, Alan and Co Jewelers LLC suffered a loss both within and outside the time periods charged in the Indictment.

² On July 23, 2025, after receiving testimony from U.S. Secret Service Special Agent Amanda Cook in co-defendant Janice Turner's sentencing hearing, this Honorable Court determined that the intended loss amount was between \$1,500,000 and \$3,500,000 and increased the base offense level by 16 levels pursuant to 2B1.1(b)(1)(I).

restitution loss of \$1,167,700. There remains no change to the total offense level as calculated by U.S. Probation.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Marc S. Anton
MARC S. ANTON
Assistant U.S. Attorney
Florida Bar No. 0148369
500 E. Broward Blvd., Suite 700
Fort Lauderdale, FL 33394
Tel: (954) 660-5096
Fax: (954) 356-7336
Marc.anton@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Marc S. Anton
Assistant U.S. Attorney